



Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 12, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: Social Card Games Rules of Play: WAC 230-40-010

Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submit the enclosed petition for rule change to amend WAC 230-40-010. The requested change would allow the Commission to consider approving games being requested by the gaming public to be played in house-banked card rooms.

We look forward to being provided the opportunity to present arguments on this issue.

Thank you in advance for your consideration of this request.

Sincerely,

Dolores A. Chiechi

Dolores A. Chiechi
Executive Director

Attachments

WWW.RGA-WA.ORG



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

To obtain this form in an alternate format, call OFM at (360) 902-0555 or TTY (360) 664-9437.

Please complete the following:

PETITIONER'S NAME (PLEASE PRINT) Recreational Gaming Association		TELEPHONE NUMBER (INCLUDE AREA CODE) 360-352-0514		
STREET ADDRESS Post Office Box 1787	PO BOX NUMBER	CITY Olympia	STATE WA	ZIP CODE 98507-1787
AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE, IF KNOWN WSGC		If unknown, call (360) 753-7470 for mailing information		

Please submit completed and signed form to the "Rules Coordinator" at the appropriate state agency. The agency will contact you within 60 days.

Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages, if needed.

I believe a new rule should be developed.

- ☐ The subject of this rule is:
- ☐ The rule will affect the following people:
- ☐ The need for the rule is

I believe this rule should be changed or repealed because (check one or more):

- ☐ It does not do what it was intended to do.
- ☐ It imposes unreasonable costs.
- ☐ It is applied differently to public and private parties.
- ☐ It is not clear.
- ☐ It is no longer needed.
- ☐ It is not authorized. The agency has no authority to make this rule.
- ☐ It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known.
- ☐ It duplicates another federal, state, or local law or rule. Please list number of the duplicate law or rule, if known.

☒ Other (please explain): It would allow the Commission to consider approving games being requested by the gaming public.

PETITIONER'S SIGNATURE <i>Dolores A. Chiechi on behalf of the Recreational Gaming Assoc.</i>	DATE 8-12-05
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Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 23, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: Social Card Games Rules of Play: WAC 230-40-010

Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submitted a petition for rule change to amend WAC 230-40-010. The requested change would allow the Commission to consider approving games being requested by the gaming public to be played in house-banked card rooms.

As mentioned in our filing, we look forward to being provided the opportunity to elaborate on the following arguments as they relate to our request:

- ✓ There is player/market demand for other social card games to be played in our member facilities;
- ✓ The interpretation of what comprises a social card game is a policy decision left to the Commission;
- ✓ We submit that, for example, mini baccarat is structured and therefore, easily regulated and could be approved for play in non-tribal establishments with a few rule changes, and
- ✓ As new games are created such as *Texas Shootout*, *Four-card poker*, *Emperor's Challenge*, they are presented to the commission staff and are often approved and subsequently offered in licensed establishments.

We appreciate your consideration and thank you in advance for the opportunity to present more information on this issue over the next few months.

Sincerely,

Dolores A. Chicchi
Executive Director